



December 20, 2016

Via Universal Licensing System and Electronic Comment Filing System

Marlene Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: SUPPLEMENT to Sprint Request for Waiver to Permit 800 MHz Wideband Operations in Portions of Arizona Prior to Completion of 800 MHz Band Reconfiguration in the Entire NPSPAC Region, WT Docket 16-295

Dear Sir or Madam:

On August 11, 2016, Sprint Corporation ("Sprint") filed a request for a waiver for its 800 MHz Economic Area ("EA") call signs WPOH379 (BEA158 - Phoenix, AZ); WPOH373 (BEA156 - Albuquerque, NM); WPOH368 (BEA154 - Flagstaff, AZ); and WPOH366 (BEA153 - Las Vegas, NV) to permit accelerated deployment of commercial broadband wireless facilities in Arizona while causing no increased risk of interference to the handful of 800 MHz public safety incumbents that have yet to complete band reconfiguration in the U.S. – Mexico Border Region.

On August 23, 2016, Sprint provided concurrences from two of the remaining three public safety incumbents in Arizona: Pima County and the State of Arizona. Sprint indicated that due to then ongoing wildfires in San Bernardino County, it would not repeatedly request concurrences from San Bernardino County, which still maintains sites in Arizona and has yet to complete its retune. Sprint noted, however, that San Bernardino County had agreed to previous Sprint waiver requests in both Northern California and Nevada. Sprint also described that all of Sprint's facilities would be located more than 70 miles from any San Bernardino yet-to-be-retuned facilities.

To assist the Commission in evaluating Sprint's pending waiver, Sprint provides additional data and maps to demonstrate that Sprint's proposed sites are well outside the 70-mile co-channel protection area relative to San Bernardino County. Sprint evaluated the three San Bernardino County sites that are either in Arizona or just over the border in California and calculated the distances between the County sites and proposed Sprint sites. Sprint also provides detailed maps showing the closest sites relative to San Bernardino County to demonstrate that all Sprint sites are

more than 75 miles from any County site. In the absence of a specific concurrence from the County, this information should demonstrate that there is virtually no risk of co-channel interference from Sprint's proposed sites.¹

For the foregoing reasons, Sprint requests this waiver to accelerate its broadband deployment in the Phoenix metropolitan area and other areas of Arizona to better serve its customers, consistent with the Commission's goals of expanded competitive wireless broadband availability, while fully protecting ongoing public safety operations in the 866-869 MHz portion of the 800 MHz band until they are fully retuned.

Should there be any questions, please contact the undersigned.

Sincerely,

[/s/ James B. Goldstein](#)

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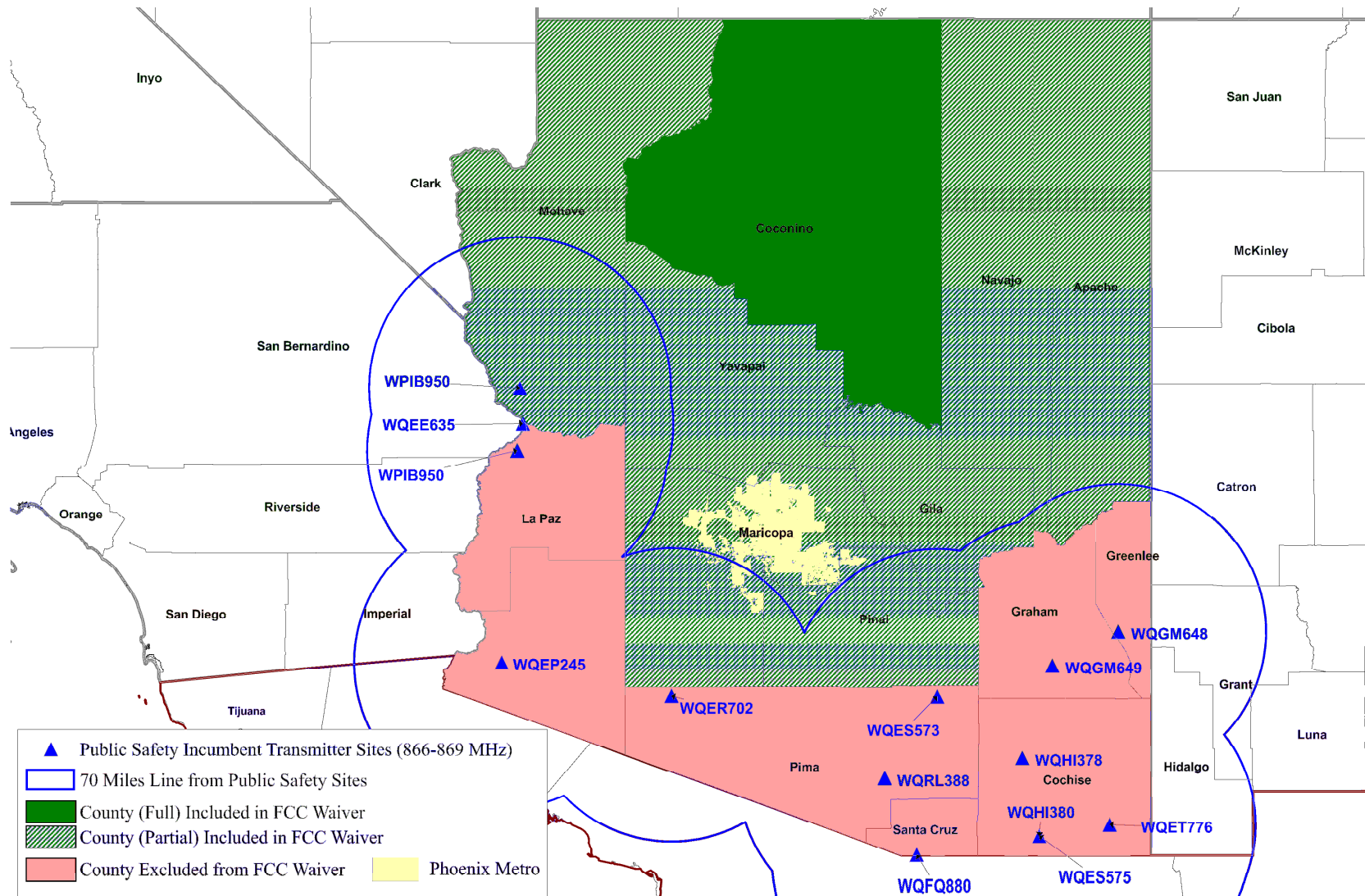
Attachment

¹ In the extremely unlikely event of interference to San Bernardino County (or any other licensee in California and Arizona) Sprint would, of course, immediately mitigate any interference pursuant to the Commission's 800 MHz interference procedures at Sections 90.972 – 90.675 of the Commission's Rules.

Sprint Supplement to Pending Arizona NPSPAC Region Waiver Request

December 19, 2016

Sprint Waiver Request Map Showing Requested Waiver Counties in Arizona NPSPAC Region 3 and Locations of Then-Current Public Safety Licensees in Arizona Once Maricopa County Completed its Retune (as submitted)



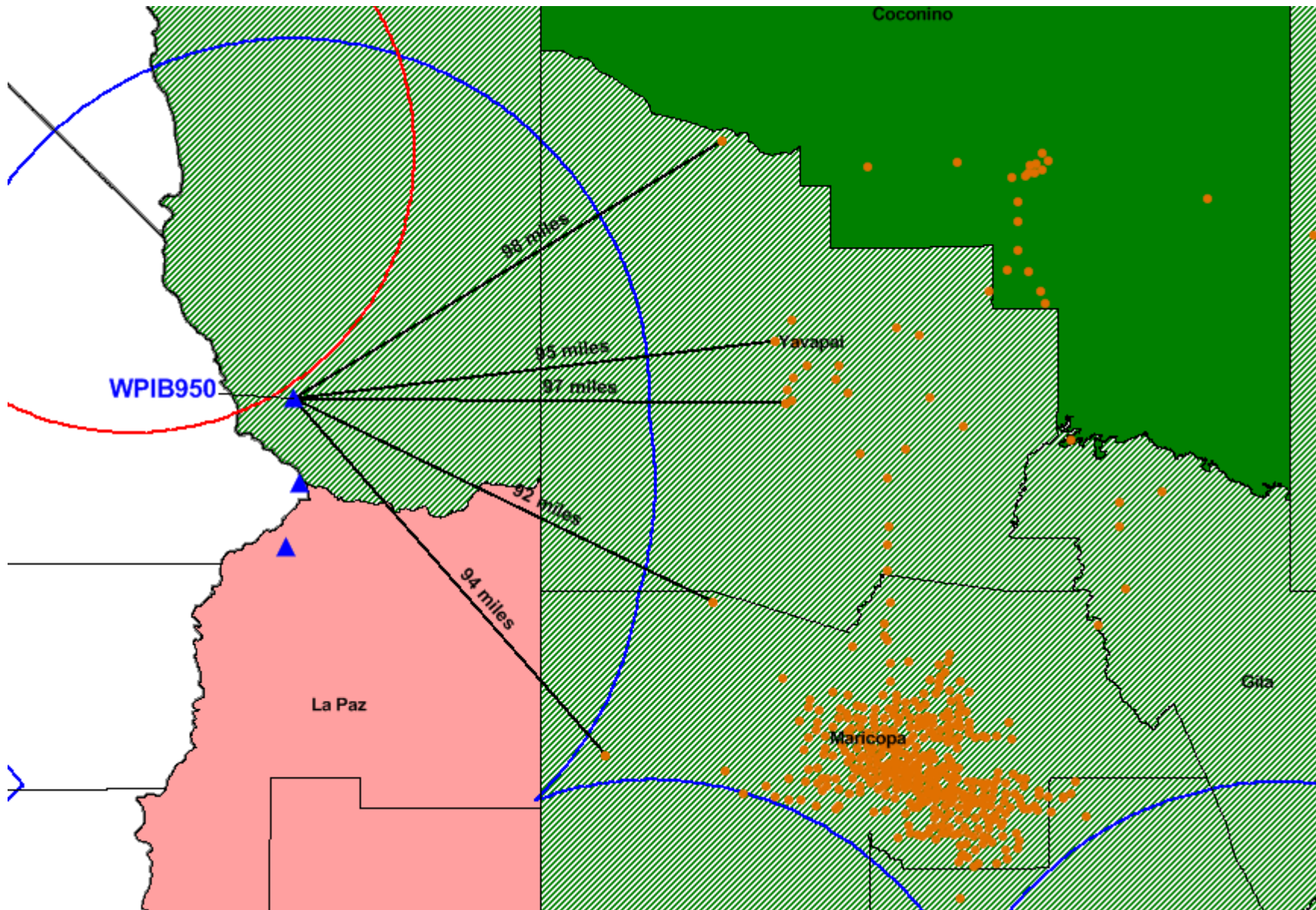
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Distance Between Closest Sprint Sites to San Bernardino County (SBC) Locations



Sprint Site	Sprint Site Lat	Sprint Site Lon	SBC Call Sign	Frequency (MHz)	SBC Location LAT	SBC Location LON	County	State	FIPS	Distance Sprint Site & SBC Location (Miles)
PH05AL021	34.53603	-112.4894167	WPIB950	868.1375	34.55	-114.18889	Mohave	AZ	4,015	97
PH05AL114	34.714306	-112.525694	WPIB950	868.1375	34.55	-114.18889	Mohave	AZ	4,015	95
PH72XC803	35.278194	-112.707569	WPIB950	868.1375	34.55	-114.18889	Mohave	AZ	4,015	98
PH33XC192	33.969097	-112.737083	WPIB950	868.1375	34.55	-114.18889	Mohave	AZ	4,015	92
PH33XC011	33.531528	-113.108681	WPIB950	868.1375	34.55	-114.18889	Mohave	AZ	4,015	94
PH05AL021	34.53603	-112.4894167	WQEE635	866.0125	34.30917	-114.16528	San Bernardino	CA	6,071	97
PH05AL114	34.714306	-112.525694	WQEE635	866.0125	34.30917	-114.16528	San Bernardino	CA	6,071	97
PH72XC803	35.278194	-112.707569	WQEE635	866.0125	34.30917	-114.16528	San Bernardino	CA	6,071	106
PH33XC192	33.969097	-112.737083	WQEE635	866.0125	34.30917	-114.16528	San Bernardino	CA	6,071	85
PH33XC011	33.531528	-113.108681	WQEE635	866.0125	34.30917	-114.16528	San Bernardino	CA	6,071	81
PH05AL021	34.53603	-112.4894167	WPIB950	868.4125	34.12444	-114.21139	La Paz	AZ	4,012	102
PH05AL114	34.714306	-112.525694	WPIB950	868.4125	34.12444	-114.21139	La Paz	AZ	4,012	104
PH72XC803	35.278194	-112.707569	WPIB950	868.4125	34.12444	-114.21139	La Paz	AZ	4,012	117
PH33XC192	33.969097	-112.737083	WPIB950	868.4125	34.12444	-114.21139	La Paz	AZ	4,012	85
PH33XC011	33.531528	-113.108681	WPIB950	868.4125	34.12444	-114.21139	La Paz	AZ	4,012	75

San Bernardino County (SBC) WPIB950 (Mohave, AZ) Distances from Sprint Sites

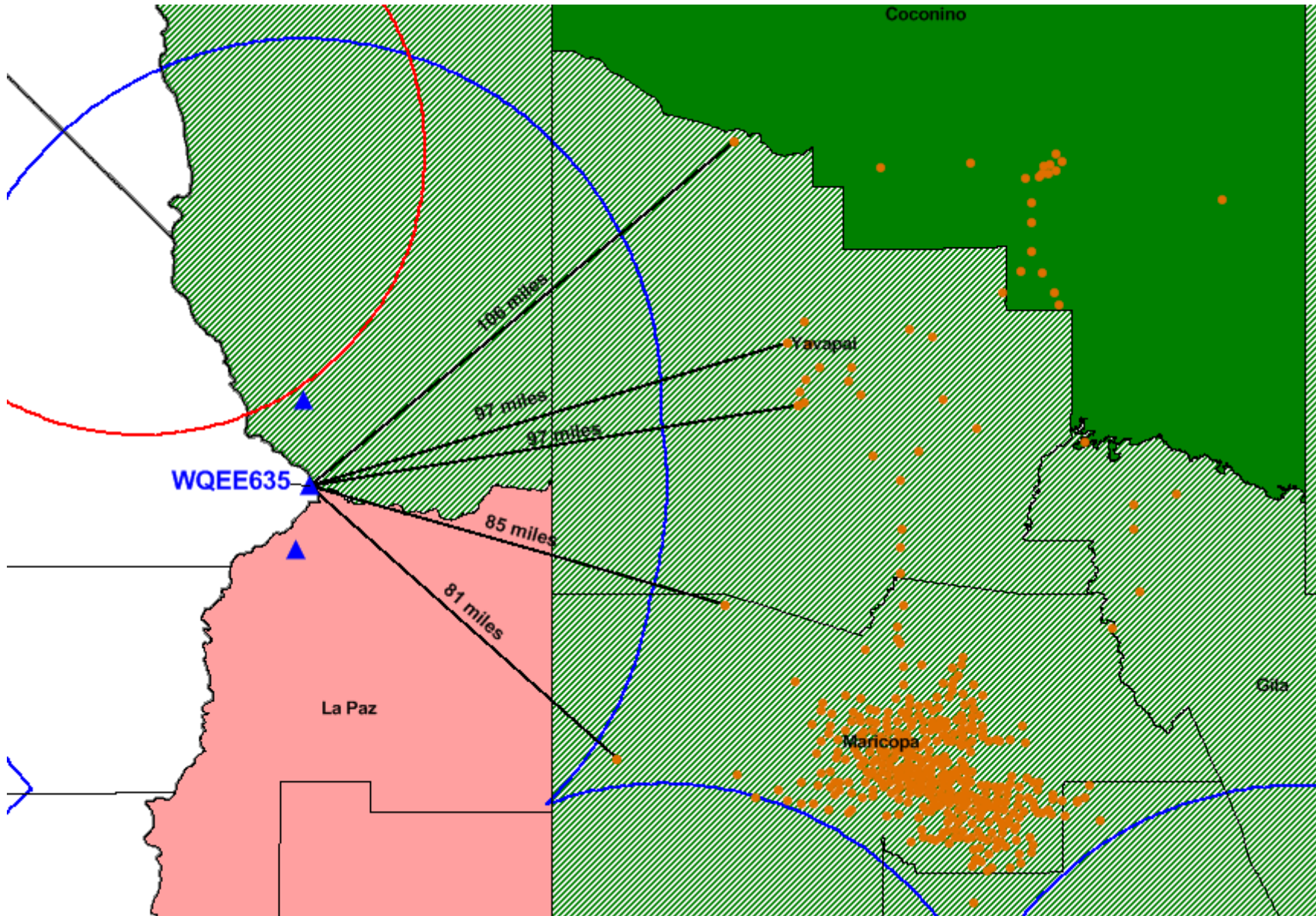


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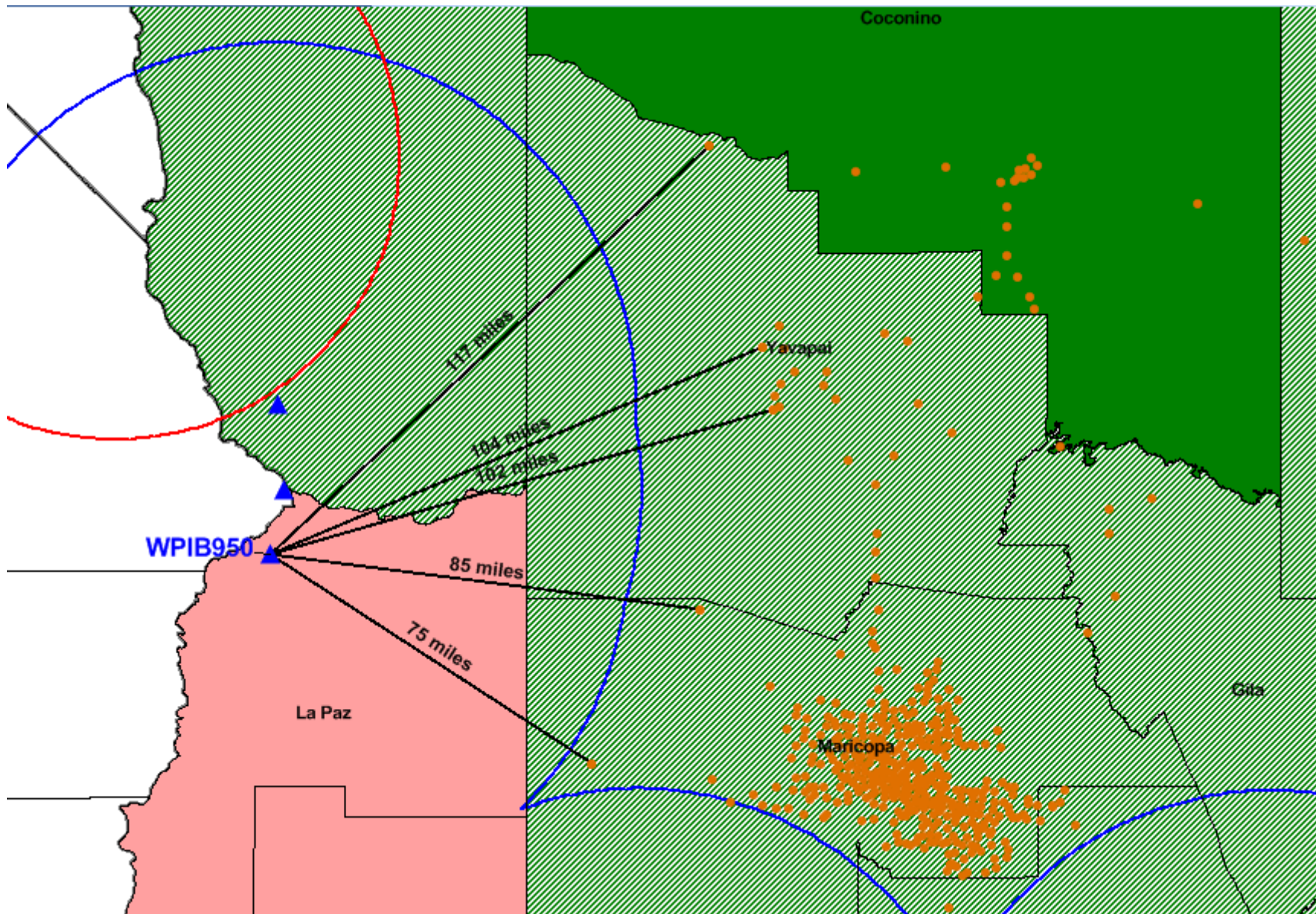
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San Bernardino County (SBC) WQEE635 (San Bernardino, CA) Distances from Sprint Sites



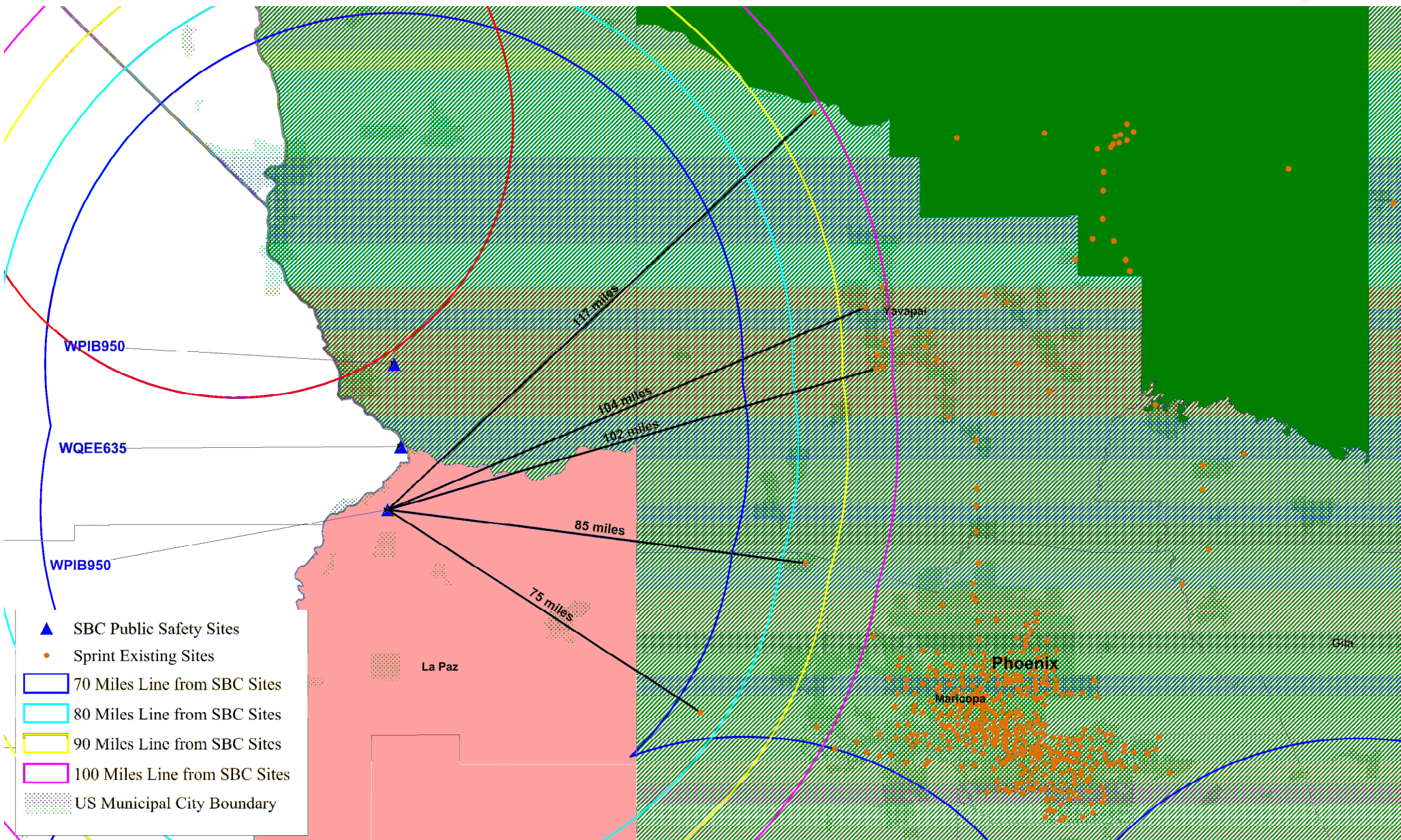
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San Bernardino County (SBC) WPIB950 (La Paz, AZ) Distances from Sprint Sites



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San Bernardino County (SBC) Site Relative Distances to Phoenix Area



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